



Michigan Milk Producers Association

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December 27, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

Re: Docket Nos. 2003P-0132 and 2000P-1491

Dear Sir/Madam:

We have reviewed the petition proposed by the IICA to amend the Ice Cream Standards of Identity and we find this proposal very disturbing.

We believe that ice cream holds a very special place in the hearts of American consumers. Ice cream is an extremely popular food item enjoyed by millions of Americans of all age groups, race and gender. Ice cream has an established "standard of identity" that the American consumer knows and loves. Ice cream is perceived as a naturally wholesome dairy product and is served to celebrate and indulge. We need to resist any attempt that could negatively alter or damage the perception that ice cream clearly enjoys in the minds of consumers. In order to maintain the integrity of "ice cream" and avoid unnecessary confusion for consumers, products that may be similar, but are not produced to the "standard of identity" for "ice cream" should continue to be categorized as "frozen desserts."

From our review of the changes proposed by IICA, it appears that there is an effort to move items currently classified as "frozen desserts" into the "ice cream" category. This is not needed or desired. Changes of this nature can only serve to weaken the category's image and place unnecessary suspicion on the integrity of dairy products in the marketplace.

We also believe that the changes proposed by IICA will hurt US dairy farmers. These changes would allow more foreign products to displace US dairy products currently used in the production of ice cream. This would only serve to move more of US milk from Class II to Class IV products, further depressing farm milk prices. Class IV nonfat is already in overabundance and any imports that displace US dairy products only forces a greater burden on the CCC program.

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Today's consumer demands more information on the ingredient composition of their purchases, not less. IICA's recommendation to "allow a manufacturer to substitute similar ingredients," without specifically identifying them on the label, defies the consumers right to useful product information. This recommendation could lead to consumer distrust and reduced popularity. We do not believe that this proposal would be beneficial to the ice cream industry.

The changes to the ice cream standards proposed by the ICCA appear ill conceived and potentially damaging to a well-established and successful category of dairy sales. We recommend that the proposed changes be rejected.

We have reviewed the comments submitted to the Division of Dockets Management by Mr. Robert Byrne of the National Milk Producers Federation in a dated December 27, 2005, and we support with his conclusions.

These comments are submitted on behalf of the Michigan Milk Producers Association which is a member owned and operated dairy cooperative serving over 2,400 dairy farmers in Michigan, Ohio, Indiana and Wisconsin. Thank you for considering our comments.

Sincerely,



Clay Galarneau
Director, Manufactured Sales and Operations